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Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
SASHANA JAMES,  
  
Defendant.

CASE NO. 2:21-CR-209 JAM

STIPULATION REQUESTING CHANGE OF PLEA  
HEARING AND REGARDING EXCLUDABLE  
TIME PERIODS UNDER SPEEDY TRIAL ACT;  
ORDER

DATE: May 23, 2022  
TIME: 9:30 a.m.  
COURT: Hon. John A. Mendez

**STIPULATION**

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status on May 23, 2022 before the Honorable Kimberly J. Mueller. On May 6, 2022, the Court related this case with Case No. 2:21-cr-186 JAM, reassigned it to this Court, and vacated all court dates. ECF 39.

2. By this stipulation, defendant now moves to set a change of plea hearing on August 2, 2022, at 9:30 a.m., and to exclude time between May 23, 2022, and August 2, 2022, under Local Code T4.

3. The parties agree and stipulate, and request that the Court find the following:

a) The government has represented that the discovery associated with this case includes over 22,200 items and pages, native files, and other items, including law enforcement

1 reports, loss amount reports, Social Security Administration records, bank and financial records,  
2 phone records, WhatsApp messages, email records, social media posts, journal entries, and  
3 photographs. The government has also produced voluminous extractions of electronic devices.  
4 All of this discovery has been either produced directly to counsel and/or made available for  
5 inspection and copying.

6 b) Counsel for defendant desires additional time to consult with her client, to review  
7 the current charges, to conduct investigation and research related to the charges, to review and  
8 copy discovery for this matter, to discuss potential resolutions with her client, and to otherwise  
9 prepare for trial.

10 c) Counsel for defendant believes that failure to grant the above-requested  
11 continuance would deny him/her the reasonable time necessary for effective preparation, taking  
12 into account the exercise of due diligence.

13 d) The government does not object to the continuance.

14 e) Based on the above-stated findings, the ends of justice served by continuing the  
15 case as requested outweigh the interest of the public and the defendant in a trial within the  
16 original date prescribed by the Speedy Trial Act.

17 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
18 et seq., within which trial must commence, the time period of May 23, 2022 to August 2, 2022,  
19 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4]  
20 because it results from a continuance granted by the Court at defendant's request on the basis of  
21 the Court's finding that the ends of justice served by taking such action outweigh the best interest  
22 of the public and the defendant in a speedy trial.

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4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: May 17, 2022

PHILLIP A. TALBERT  
United States Attorney

/s/ ROBERT J. ARTUZ  
ROBERT J. ARTUZ  
Assistant United States Attorney

Dated: May 17, 2022

/s/ MEGAN HOPKINS  
MEGAN HOPKINS  
Assistant Federal Defender  
Counsel for Defendant  
SASHANA JAMES

**ORDER**

IT IS SO FOUND AND ORDERED this 17<sup>th</sup> day of May, 2022.

/s/ John A. Mendez  
THE HONORABLE JOHN A. MENDEZ  
UNITED STATES DISTRICT COURT JUDGE